

FEED ISSUES

IGFA MONTHLY NEWSLETTER

ISSUE NO 11 | November | 2020

General News

Brexit – Webinars and Training

DAFM have run numerous webinars over the last few weeks including training on how to use TRACES, the Imports portal and how to import plants and plant products and food of animal origin. All of the training sessions have been recorded and are available [here](#). Future sessions will also be uploaded onto this webpage. For details on registering to import and export please see [here](#).

DAFM (ROI) & DEFRA (NI) are holding a webinar Thu, Dec 3, 2020 10:30am - 12:30. The registration link is available [here](#)

Brexit – Automated Import System (AIS)



At the recent meeting of the Customs Consultative Committee (CCC), Revenue confirmed that AIS was going live on 23 November. Going live on this date will allow businesses time to test their systems and processes in advance of Brexit. Revenue recognises that this is a significant change for business and that they will require additional supports to assist them through the transition. In this regard, the eCustoms telephone helpline has reopened and can be contacted on 01 738 3677. Businesses can continue to send queries to the helpdesk by email at ecustoms@revenue.ie

At the CCC meeting, Revenue was asked to allow an overlap period so that our existing AEP system and the new AIS system could run at the same time. Trade representatives suggested that this would facilitate operators in transferring their businesses to the new environment. In light of this request and recognising the difficult environment that businesses are currently operating in, access to AEP for new declarations will be extended until Tuesday 15 December. They would however recommend that businesses move to AIS ahead of this deadline in order to ensure that business is fully migrated to AIS in advance of the closure of AEP and in sufficient time to ensure readiness for the Brexit deadline of 1 January 2021.

Agriculture Market Situation

EU member states reported to the Farm Council on 12 November on the situation in agriculture markets. Several member states asked for market

CONTENTS

Brexit – Webinars and Training	1
Brexit – Automated Import System	1
Agriculture Market Situation	1
EU Feed Protein Balance Sheets	2
Proposal to Update Maize Levy	2
UK Wheat and Barley Production	2
Brexit – DAFM	2
Medicated Feed – Dafm	2
Medicated Feed – Carry Over Levels	3
Ufas Update	4
UK Guidance- Pesticide Regulations	5
Biocontrol for Aflatoxin	5
GMO	5
Outcome Nov SCoPAFF	5
Animal Health	7
FAQ	7

WHAT'S ON

Dec	Teagasc Events
Dec 1 st	Feed Committee Meeting
Dec 3 rd	DAFM/DEFRA Brexit
Dec 4 th	iNAP Committee Meeting

USEFUL LINKS

IGFA Covid 19	Gov Covid 19
HSE Covid 19	CDC Covid 19
Crop Forecast	Irish Fbo's
Protein Balance	Fbo Forms
Oeju	Dafm Brexit
Fsai Amr	Dafm Amr
Compound feed Labelling Code	
Dafm Trader Notices	SCoPAFF
WASDE	

RASFF Nov 2020

Total Food & Feed	541
Food	504
Food Contact Materials	12
Total Feed	25
Feed Materials	20
Feed Premixtures	0
Feed Additives	1
Compound Feed	1
Nuts, products and seeds	0
Pet food	3

interventions to address the current challenges associated with Covid 19. According to EU farm commissioner Wojciechowski, the European Commission is not preparing any exceptional measures at the moment but is open to do so if the situation worsens. A number of countries called for support in the pig sector to deal with the African Swine Fever (ASF) situation and DG AGRI is considering the request. Ireland highlighted a range of concerns (page 14) but also the potential detrimental impact of Brexit on agricultural markets. The full report is available [here](#).

New EU Feed Protein Balance Sheets

DG AGRI published its final [EU+UK feed protein balance sheet for the marketing year 2019/20](#), showing an increased self-sufficiency rate in protein feed to almost 79%, thanks to higher availability of roughage. **However**, the lower availability of EU rapeseed caused a decreased self-sufficiency rate for co-products by 2% compared to the EU+UK feed protein balance sheet for 2018/19. In addition, for the first time, DG AGRI published its feed protein demand forecast, [EU feed protein balance sheet for MY 2020/2021](#). Future balance sheets will be for EU27 only. There will also be a new feed source category of "other protein crops", consisting of mainly chickpeas and lentils usage in feed. With Brexit, the EU protein feed self-sufficiency decreases slightly given the relatively high share of roughage in the UK compared to other protein sources.

Proposal to Update Maize Levy

The maize levy is currently calculated taking the difference between the threshold price of maize (€157.03) and the 10 days moving average of the price on the Chicago Board of Trade (CBOT) for the nearest month plus FOB premiums for US Gulf no. 3 Yellow Corn.

Industry is proposing a change to this as the process is very cumbersome. It is suggesting calculating the 10-day average from Fridays until Thursdays and publishing a new Levy on Mondays and calculating the levy by taking the difference between the threshold price of €157.03 and the 10 days moving average of CBOT of the nearest month plus one month. Once the industry position is agreed by the Commission and a proposal published, IGFA will request DAFM to support it at the market management committee unless members raise objections.

Estimates on UK Wheat and Barley Production

The Department for Environment, Food and Rural Affairs (Defra) has published first [estimates](#) of the UK wheat and barley production 2020. Production of wheat shows a decrease of 37.5% from 2019 and production of barley a 3.9% increase. Final results are planned to be released on 17 December 2020.

Brexit - DAFM/IGFA meeting

On 16 November DAFM feeding stuff division held a virtual meeting with IGFA members. Sheila Nolan, Head of Division, opened the meeting with a [presentation](#) of the organisational structure and the work that is undertaken by DAFM staff. She also provided us with [contact details](#) for all staff.

The general requirements for feed businesses who import feed from third countries, which will include UK from Jan 2021, was outlined. DAFM is currently preparing a Q&A document on Brexit so that the information can be easily circulated. If you have any further questions please send them to deirdre.webb@eorna.ie or maeve.whyte@eorna.ie

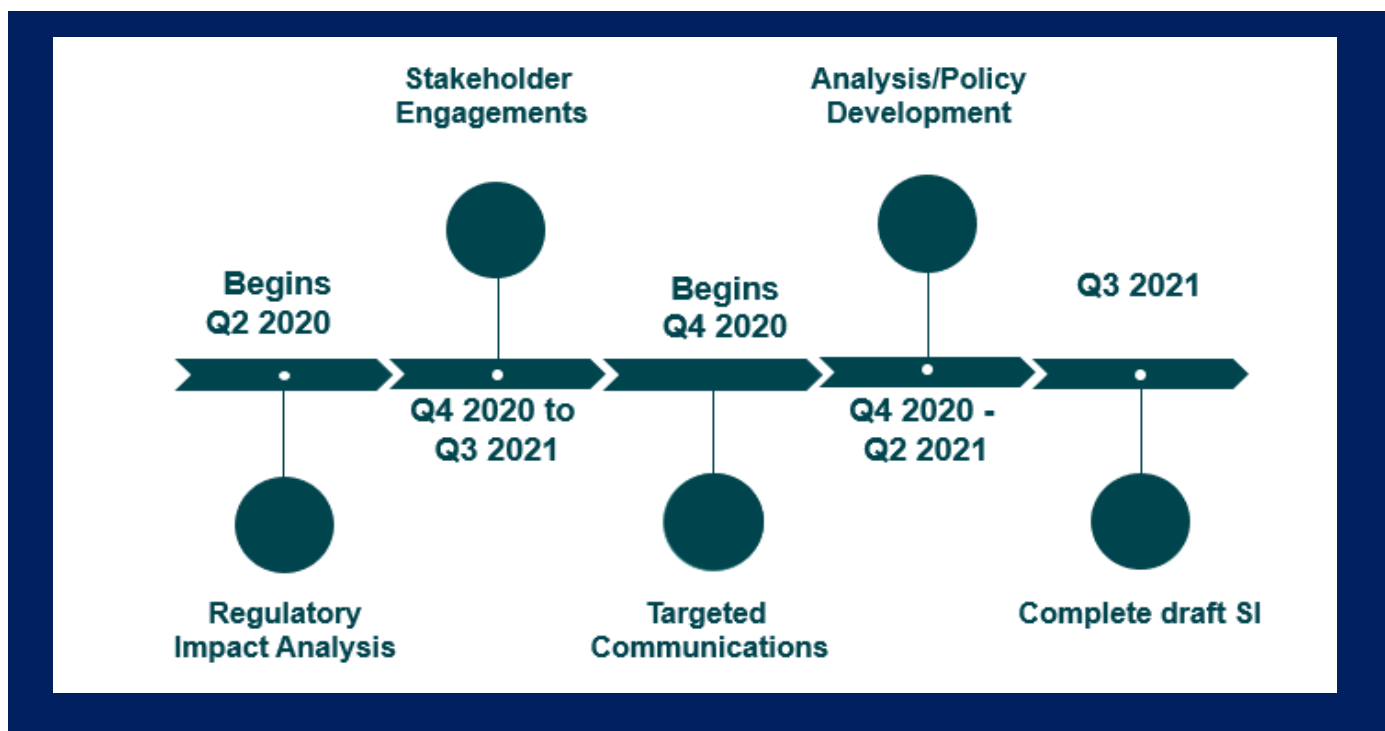
Medicated Feed - DAFM/IGFA Meeting

On 23 November the DAFM veterinary medicine division held a virtual meeting with IGFA medicated feed members to discuss the new medicated feed regulation [EU 2019/4](#). This regulation comes into force on 28 January 2022 and the main objective is to support EU actions to fight antimicrobial resistance.

Some of the key provisions of the new regulation are as follows

- Sets down maximum levels of cross contamination for 24 antimicrobials based on EU scientific advice. These are 1. Amoxicillin 2. Amprolium 3. Apramycin 4. Chlortetracycline 5. Colistin 6. Doxycycline 7. Florfenicol 8. Flumequine 9. Lincomycin 10. Neomycin 11. Spectinomycin 12. Sulfonamides 13. Tetracycline 14. Oxytetracycline 15. Oxolinic Acid 16. Paromomycin 17. Penicillin V 18. Tiamulin 19. Tiamfenicol 20. Tilimicosin 21. Trimethoprim 22. Tylosin 23. Valnemulin 24. Tylvalosin)
- Criteria for homogeneity to be established (10% coefficient of variation is acceptable level currently).
- Detailed rules around prescriptions including new maximum validity dates.
- Rules around the use of medicated feed – not for prophylaxis. Targeted animal usage.
- Member States to collect data on antimicrobial medicinal products used in animals (see [link](#) to consultation open until 18 December 2020)
- System for the disposal of unused medicated feed to be put in place (DAFM not considering return to feed mills due to biosecurity risks and expect there would be no unused feed on farms).

As [EU 2019/4](#) is a general regulation, it requires national legislation. Ireland will repeal existing legislation [SI 176/1994](#) which medicated feed licences are currently granted under and a new SI will be issued. This meeting was part of the consultation with industry stakeholders and DAFM staff who attended are involved in drafting the new SI. They outlined the stages of the process with the graphic below.



Medicated Feed - Determination of Maximum Carry-Over Levels

A methodology has been developed by The European Food Safety Authority (EFSA), in consultation with the European Medicine Agency, with a view to set maximum limits for antibiotics in non-target feed in the undesirable substance's directive. This is required by Regulation [EU 2019/4](#) on medicated feed as discussed at our meeting with DAFM on 23 November (outlined above). EFSA's opinions are expected by September 2021. Currently the maximum limits calculated with this EFSA methodology would be in the order of magnitude of 1 ppb i.e., 100 to 1000 times lower than the MRL's set for the same antibiotics in food products.

FEFAC Animal Nutrition Committee and the Medicated Feed Task Force (includes IGFA) have written to the Commission to express concerns about the unworkability of these maximum limits.

1. These levels are below what is technically achievable in feed mills, even with end of line mixers, whether in the plant or at the back of the trucks.
2. These maximum limits are far below the LOD of methods of analysis and false positives due to presence of antibiotics via other pathways such as PAPs etc.

FEFAC suggested the Commission define an acceptable level of risk and/or ask for a new mandate from EFSA. FEFAC also questioned the lack of attention paid to the fact that animals are exposed only for a short period of time to batches of feed containing residues of antibiotics resulting from carry-over from medicated feed.

UFAS Update

The last UFAS working group meeting was held on 15 October. Below are some of the key points.

UFAS audits are being carried out fully remotely again following increased restrictions due to Covid 19. Pre-submission of documents, although requiring extra work for participants in advance of the audit, is leading to more effective use of time during the audit. Auditors are now able to move directly into detailed, constructive questions about procedures and processes.

Mutual Recognition with other quality schemes: It was reported that mutual recognition agreements would continue after Brexit and that ongoing dialogue with overseas scheme partners was strong and constructive.

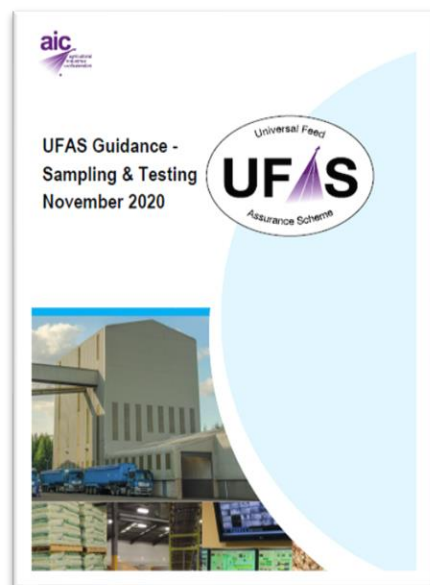
***Sampling and Testing Guidance;** a revised edition 5 for UFAS participants has been completed and will be available on the UFAS website shortly.

Earned Recognition Update; It was reported that contact between AIC and the UK authorities had increased during the Covid 19 restrictions as they sought to understand how the remote auditing approach was working. Currently meetings take place every 6 weeks. This is something we at IGFA continue to request with DAFM.

FEMAS Calculator; Work was ongoing to update the risk assessments contained within the FEMAS Calculator, as well as improving the functionality in relation to additives and feed materials that were not listed in the Catalogue of Feed Materials.

*UFAS [sampling and testing guidance](#) document is a very useful resource. It contains a lot of useful information e.g.

- Sample size should be sufficient to enable initial testing and retention for future reference, investigations or additional testing. Typically, this would require approximately 250 grams as a minimum.
- A representative finished feed sample for each delivery must be taken, preferably from the point of loading or alternatively from a final stage within the manufacturing process, if sampling at loading is not feasible.
- Testing is not limited to laboratory analysis; visual inspection has a place within sample assessments.
- The testing recommendation for medicated feed is the square root of 1% of the medicated/specified feed additive tonnage produced per annum (minimum 1 sample). For example, if you produce 1000 tons, the UFAS recommendation is to carry out analysis on 3 samples.
- Ensure laboratories used for analysis are able to measure to a suitable limit of detection/quantification. Informing them in advance to ensure suitable dilution is applied to the test can reduce delays.



Technical News

UK Guidance- Complying with Pesticide Regulations 1 Jan 2021

The Department for Environment, Food and Rural Affairs (Defra) has published guidance on complying with pesticide regulations from 1 January 2021. Great Britain (England, Scotland and Wales) will establish independent pesticides regulatory rules on 1 January 2021. Current product authorisations and MRLs will still be valid in GB from 1 January 2021. The Health and Safety Executive (HSE) will continue to operate as the UK's regulator. Under the terms of the Northern Ireland Protocol, the EU pesticides rules will continue to apply in Northern Ireland after 1 January 2021.

Public Consultation on Aspergillus Flavus, strain MUCL54911 (Biocontrol for Aflatoxin)

The European Food Safety Authority (EFSA) has launched a public consultation on the active substance Aspergillus Flavus, strain MUCL54911. The active ingredient is intended for use on maize crops to reduce aflatoxin contamination by competitive exclusion and displacing toxigenic strains of the fungus. The dossier has been submitted by Pioneer and the intention is to use it in the form of a seed treatment. This specific non-toxicogenic A. flavus MUCL54911 strain has been isolated from maize kernels in northern Italy and selected as the best biocontrol agent by displaying the greatest efficacy in reducing aflatoxins in Italian field situations.

GMO

IGFA was informed in October of a request from Syngenta to approve, as "feed only", the Distiller's Dried Grains Soluble (DDGS) 3272 GM Maize. This was after a partial EFSA risk-assessment. IGFA alerted GAFTA, COCERAL and FEFAC, none of whom had been informed by the Commission or Syngenta. There was also no request for an opinion from the EU industry despite this being in the SCoPAFF pipeline.

Background

- 3272 maize is intended for bioethanol production and the by-products can be used for feed supplements as they rich in specific nutrients.
- DDGS exports to the EU account for 5% and Portugal, Spain and Ireland are the principal destination markets. They are supposed to be segregated from other food and feed materials and bagged in sealed containers. This is how Syngenta presented the dossier risks for traders.
- Experience has shown that DDGS enter the supply chain but not always in sealed bags or containers as assumed by Syngenta. Therefore, there could be a risk of cross-contamination.
- EFSA could not conclude on its allergenicity.

The Commission is considering evaluating a "Feed Only" approval for 3272. This is new ground as regulation 1829/2003 is about joint food and feed GM approval. It is apparent that the request to have a "feed-only" submission is related to the lack of conclusions on allergenicity by EFSA. Industry is now in contact with Syngenta and the Commission with the aim of better understanding the whole process and future intentions. We will keep members updated.

Outcome of the SCoPAFF meeting of 12-13 November 2020

Mycotoxins

At the SCoPAFF meeting on 12-13 November, SCoPAFF have decided to consult stakeholders on the switch from guidance values to **maximum limits for complete feed, while leaving guidance levels on feed materials**. Discussions on this topic will resume after this stakeholder consultation has been completed in mid-January 2021.

The consultation will be based on a working document drafted by a SCoPAFF Working Group on contaminants on 6 November. Compared to earlier positions, the main novelties concern the level of fumonisins in pig feed that would be lowered from 5 to 0.5 ppm and the setting of maximum limits (or guidance values) for zearalenone and fumonisins for all species (until now, the guidance values concerned only the most sensitive species). Before the SCoPAFF meeting, a coalition of key organisations including FEFAC wrote to Commissioner Kyriakides asking to suspend the establishment of maximum limits (for feed and food). They also asked for an evaluation of the fitness of the EU risk management policy for mycotoxins, taking into account certain Green Deal ambitions that may favour mycotoxin occurrence in EU crops and a [Joint Food & Feed chain reflection paper on mycotoxins risk management](#). In this document, the chain asks the EU authorities to leave more margin of manoeuvre to operators to organise the management of the mycotoxin risks via chain agreements.

EU Catalogue of Feed Materials

SCoPAFF also discussed the EU Catalogue of feed materials and requested the EU Feed Chain Task Force to reconsider once again the description of the extraction process and specifically to remove completely the term “extract” as a qualifier for a feed material. They also agreed to set maximum content for cannabidiol (CBD) in hemp products while establishing in parallel, maximum limits for Tetrahydrocannabinol (THC) under the Undesirable Substances Directive. They opposed the inclusion of a generic entry for former foodstuffs from vegetable origins, considering this would not be informative enough. Finally, they asked the EU Feed Chain Task Force to answer several questions concerning feed materials from fermentation and **held the view that restrictions should be set on the use of seaweed products considering the extremely high natural content of this feed material in iodine and bromine**. Another round of discussions on the catalogue is scheduled for the SCoPAFF meeting 14-16 December and a vote at the earliest at the meeting on 19-21 April 2021.

Liquid Complementary Feed

The question of use in water of complementary feed containing feed additives not authorized specifically for use in water and for which a maximum limit is set in the authorization act was discussed.

The EU Commission services confirmed the interpretation given in September / October 2019 i.e. that

- such complementary feed may be delivered in water but not in drinking water and required the dosing of the additive in a specific tank in which the complementary feed is diluted in a predefined amount of water delivered to the animals during a limited period of time needed for the animals to ingest it all.
- The “liquid feed” may be delivered to the animals via the drinking water system but not at the same time as drinking water.
- Complementary feed containing additives authorised in water or without max limit in the diet may still be delivered via drinking water.
- The EU Commission services specified that this interpretation is valid not only for trace-elements not authorized in water but also to other nutritional feed additives where a maximum limit is set.



It seems that, on the question of delivery of complementary feed using the drinking water system, opinions of national authorities differ, some considering that “pure” drinking water should be available permanently to animals. This discussion will continue at the SCoPAFF meeting in February 2021.

Feed Additives

They extended until the end of 2022 the suspension of the authorization of ethoxyquin. The re-authorisation of vitamin B12 is expected to be discussed at the SCoPAFF meeting on 14-16 December after the adoption of its opinion by EFSA. As regards vitamin B2 fit for use in organic farming, the EFSA opinion is not expected before the end of January 2021, meaning further delay before its possible authorization.

Animal Health

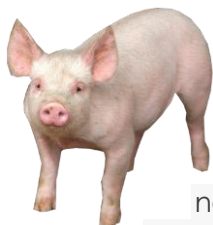
Avian Influenza

Avian influenza (also called 'bird flu') is a viral disease that primarily affects poultry and wild fowl.

- Highly Pathogenic Avian Influenza (HPAI): spreads rapidly causing serious disease with high mortality (up to 100% within 48 hours)
- Low Pathogenic Avian Influenza (LPAI): causing generally a mild disease, may easily go undetected

Since the Avian Influenza Alert Number 11 of 2020 which was published by DAFM on the 28/10/2020 and brought to your attention in IGFA Oct feed issues, outbreaks of Avian influenza have been confirmed in mainland Europe and in the United Kingdom. Poultry owners throughout Ireland should ensure that strict biosecurity measures are implemented to prevent infections of their flocks. Please see [link](#) to DAFM latest Alert Number 12 of 2020 published on November 4 2020.

African Swine Fever (ASF)



ASF is a viral disease that affects domestic pigs and wild boar. The last update on DAFM was September 11 2020 see [link](#)

The global industry continues to monitor the ASF outbreak in Germany that was first reported September 10, 2020 in feral swine in Brandenburg state, located in the eastern part of Germany near its border with Poland. Germany can continue to export within the EU, but outside of the EU, most of their trade has been halted. Germany is working to regionalize the outbreak and bring back the trade lost due to the outbreak only coming from the feral swine population.

Igfa Frequently Asked Questions

Why do I need to know the classification codes for products?

If you import or export goods into or out of the EU you must classify those goods for customs purposes. This classification code determines the amount of customs duty you will pay on imported goods

Where can I find the code for my product?

You can use [TARIC](#) which is the EU database where you will find all the codes. Products are broken down into chapters. Preparations of animal feeding stuff is in Chapter 23.

Measures | Geographical areas | Regulations

Search by goods code and geographical area

Goods code [Browse] Origin/destination

23 [Advanced search]

Retrieve Measures

Key in 23 and the country product is being imported from. Hit retrieve measure. Moving through the pages to page 26 – 50 you will see. **2309** Preparations of a kind used in animal feeding.

239010 for dog or cat food, put up for retail sale

Move to pages 51 -75 and you will see 230990 for all other
The next four digits will depend on your product formulation

This video will assist you see [link](#)